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*Attorney for Defendant
Harbor Freight Tools USA, Inc.
and William Rogers*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

DAN GOULD, an individual, and AUDREE GOULD, an individual,

Case No. 2:17-cv-02435-APG-NJK

Plaintiffs,

VS.

WILLIAM ROGERS, an individual,
HARBOR FREIGHT TOOLS USA, INC.,
a California Corporation, DOES I through
X, inclusive, and ROE CORPORATIONS I
through X, inclusive,

Defendants.

**STIPULATION AND ORDER TO
CONTINUE RESPONSE TO
PLAINTIFFS' COMPLAINT AND
MOTION FOR REMAND**

[SECOND REQUEST]

Plaintiffs Dan and Audree Gould, and Defendants William Rogers (“Rogers”) and Harbor Freight Tools USA, Inc. (“Harbor Freight,” together with Rogers, “Defendants”), through their respective counsel, stipulate for the second time to continue Defendant Rogers’ response to Plaintiffs’ Complaint and Defendants’ response to Plaintiffs’ Motion for Remand, ECF No. 10, as follows:

WHEREAS, Plaintiffs served Defendant Rogers with the Summons and Complaint on October 6, 2017;

WHEREAS, Defendant Rogers' response to Plaintiffs' Complaint is due November 10, 2017;

WHEREAS, Defendants' response to Plaintiffs' Motion for Remand is due November 13, 2017;

1 WHEREAS, this request is timely;

2 WHEREAS, the Parties agreed to provide Defendants' additional time to respond to
3 Plaintiffs' Complaint and Motion for Remand to permit Defendants to file a stipulation to
4 substitute Clyde & Co US LLP as counsel of record and to provide the Court sufficient time to
5 issue an order on the same;

6 WHEREAS, this request is not made for purposes of delay and is supported by good
7 cause;

8 NOW, THEREFORE, in consideration of the foregoing, and for good cause, IT IS
9 HEREBY STIPULATED AND AGREED, by and between the Parties as follows:

10 1. Defendant Rogers will respond to Plaintiffs' Complaint on or before
11 November 16, 2017.

12 2. Defendants will respond to Plaintiffs' Motion for Remand on or before
13 November 16, 2017.

14 **IT IS SO STIPULATED.**

15 DATED: November 6, 2017.
16 JENNINGS & FULTON, LTD.

17 By: /s/ Adam R. Fulton
18 JARED B. JENNINGS, ESQ.
ADAM R. FULTON, ESQ.
TOD R. DUBOW, ESQ.
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22 *Attorneys for Plaintiffs*

DATED: November 6, 2017.
SNELL & WILMER L.L.P.

By: /s/ Karl O. Riley
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3883 Howard Hughes Parkway,
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*Attorney for Defendants William
Rogers and Harbor Freight Tools
USA, Inc.*

23 **ORDER**

24 IT IS ORDERED that Defendant Rogers shall respond to Plaintiffs' Complaint on or before
25 November 16, 2017.

26 IT IS ORDERED that Defendants shall respond to Plaintiffs' Motion for Remand on or
before November 16, 2017.

27 Dated: November 8, 2017.


28 UNITED STATES DISTRICT JUDGE